RICHARD PALMA

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November 15, 2019

ECF filed

Honorable Laura Taylor Swain United States District Judge U.S. District Court for S.D.N.Y. 500 Pearl Street New York, N.Y. 10007

MEMO ENDORSED

Re:

U.S. v. Wang, 18 Cr. 905 (LTW)

Without objection by the Government, this is a joint request on behalf of Defendants Xiao Wang & Jian Feng Wu to continue the November 19th Status Conference to an afternoon of the week of December 16th.

Dear Judge Swain:

As attorneys of record for Messrs. Jian Feng Wu and Xiao Wang, Mr. Christopher Madiou and I respectfully request that our November 19th court appearances before Your Honor be continued to the week of December 16th in the afternoon. The Government does not oppose this joint defense request. I can represent to the Court on behalf of Mr. Madiou and myself that the parties are actively involved in plea negotiations with the Government and that we anticipate a resolution of our respective cases without a trial by the next court appearance. Finally, the parties content to the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161.

I am available immediately to Your Honor should the Court have questions about this request. My cellular phone number is (917) 751-5754.

Thank you.

- espectfully submitted,

Richard Palma

chard Palma (Bar No. rp 4441)

LAURATAYLOR SWAIN, USDJ

RICHARD PALMA ATTORNEY AT LAW